

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:)	
)	
)	PROMESA
THE FINANCIAL OVERSIGHT AND)	Title III
MANAGEMENT BOARD FOR PUERTO RICO,)	
as representative of)	Case No. 3:17-bk-03283 (LTS)
THE COMMONWEALTH OF PUERTO RICO, <i>et al.</i> ,)	
Debtors.)	
)	
	X	
In re:)	
)	
)	PROMESA
THE FINANCIAL OVERSIGHT AND)	Title III
MANAGEMENT BOARD FOR PUERTO RICO)	
as representative of)	Case No. 3:17-cv-01685 (LTS)
)	Case No. 3:17-bk-03566 (LTS)
THE EMPLOYEES RETIREMENT SYSTEM OF THE)	
GOVERNMENT OF THE COMMONWEALTH OF)	
PUERTO RICO,)	
Debtor.)	
)	
	X	

**DECLARATION OF SPARKLE L. SOOKNANAN
IN SUPPORT OF MOTION OF
ANDALUSIAN GLOBAL DESIGNATED ACTIVITY COMPANY,
MASON CAPITAL MASTER FUND, LP, AND THE PUERTO RICO FUNDS
FOR A PROTECTIVE ORDER**

I, Sparkle L. Sooknanan, hereby declare under penalty of perjury:

1. I am an associate at the law firm of Jones Day, located at 51 Louisiana Ave., N.W., Washington, D.C. 20001.¹ I am a member in good standing of the Bars of the State of New York and the District of Columbia. There are no disciplinary proceedings pending against me. I submit this declaration in support of the *Motion of Andalusian Global Designated Activity Company, Mason Capital Master Fund LP, and the Puerto Rico Funds for a Protective Order* (the "Motion"). I have personal knowledge of the matters stated herein.

2. On March 7, 2019, counsel for the Financial Oversight and Management Board for Puerto Rico (the "Oversight Board") noticed depositions of Andalusian Global Designated Activity Company, Mason Capital Master Fund, LP, and the Puerto Rico Funds pursuant to Federal Rule of Civil Procedure 30(b)(6). Attached to each deposition notice was a list of twenty-three deposition topics. Counsel for the Oversight Board also noticed individual depositions of James Bolin, Richard Engman, and Leslie Highley, Jr. True and correct copies of the notices are attached herein as Exhibit A, Exhibit B, Exhibit C, Exhibit D, Exhibit E and Exhibit F. The depositions were originally noticed for March 11, 12, and 13, 2019, but have now been continued in accordance with the extended deadlines the Court adopted on March 15, 2019.

3. On March 12, counsel for Movants objected to the deposition notices served by the Oversight Board as overbroad and burdensome, and requested that the Oversight Board narrow the scope of the requests. *See* Email correspondence between S. Sooknanan and W. Dalsen (Mar. 12, 2019), a true and correct copy attached hereto as Exhibit G.

4. On March 18, 2019, the parties engaged in a 90-minute telephonic meet-and-confer session to discuss various discovery issues, including the Oversight Board's deposition

¹ Capitalized terms used but not otherwise defined herein will have the meaning as set forth in the Motion.

notices to Movants, in an effort to narrow the issues. Movants stated their objections to the overbroad and burdensome requests and re-stated their request to narrow the requests. Counsel for the Oversight Board noted that he believed there was some room for narrowing some of the requests and that the Oversight Board would respond to Movants the next day regarding their objections. The parties agreed to discuss the matter further once the Oversight Board's response was received.

5. On March 19, 2019, the parties exchanged further communications regarding the topics discussed at the meet-and-confer the previous day. The Oversight Board indicated that it would respond separately to Movants' objection to the 30(b)(6) notices served on Movants. Email correspondence between W. Dalsen and M. Papez (Mar. 19, 2019), a true and correct copy attached hereto as Exhibit H. Between March 18, 2019 and April 10, 2019, Movants received no proposals to narrow the deposition topics.

6. On April 10, 2019, counsel for the Oversight Board sent counsel for Movants a letter demanding that Movants withdraw their objections to the deposition notices. A true and correct copy of the letter is attached hereto as Exhibit I.

7. On April 11, 2019, the parties engaged in a 50-minute telephonic meet-and-confer session to discuss various discovery issues, including Movants' objections to the Oversight Board's deposition topics. The parties were unable to resolve their disagreements.

Dated: April 14, 2019
Washington, D.C.

/s/ Sparkle L. Sooknanan
Sparkle L. Sooknanan